## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

URB, INC.	
Plaintiff,	Case No. 08 C 582
<b>v.</b>	Judge Joan B. Gottschall
STARTREHAB, INC., ROBERT BINGHAM and GREGORY BINGHAM, individually,	Magistrate Judge Geraldine Soat Brown
Defendants.	
PIONEER SERVICES, LLC and 7303 ) INCORPORATED d/b/a/ STARTREHAB, ) INC.	
Third-Party Plaintiffs,	
<b>v.</b>	
URB, INC., XEZ, INC. and ANTHONY URBANOWSKI,	
Third-Party Defendants.	, )

## JOINT MOTION FOR AN AGREED ORDER

The Plaintiff, Urb, Inc., Defendants StartRehab, Inc., Robert Bingham, and Gregory Bingham, Third-Party Plaintiffs Pioneer Services, LLC and 7303 Incorporated d/b/a StartRehab, Inc. and Third-Party Defendants, Urb, Inc., XEZ, Inc. and Anthony Urbanowski ("the Parties"), by and through their respective counsel, jointly move this Court for entry of an agreed order as follows:

- Case 1:08-cv-00582
- 1. This Court held an Initial Status hearing in this matter on April 16, 2006. At that hearing, several suggested and agreed dates were reported to and approved by this Court. The purpose of this Joint Motion is to request the Court's formal approval of those dates by the entry of an order memorializing them.
- 2. The Parties have agreed and the Court orally approved that the time for Third-Party Defendants Urb, Inc., XEZ, Inc. and Anthony Urbanowski to submit their respective answers or other responses to the Third-Party Complaint is extended to May 12, 2008.
- 3. The Parties have agreed and the Court orally approved that the schedule to conduct discovery should proceed as set forth below:

First set of document requests and interrogatories to be served	June 13, 2008
Motions to amend pleadings or join additional parties shall be filed on or before	October 13, 2008
Fact Discovery Closes	December 15, 2008
Experts Reports Due	January 16, 2009
Rebuttal Expert Reports Due	February 28, 2009
Expert Discovery Close	April 15, 2009
Dispositive Motions Due	May18, 2009
Trial Begins	Per the Court's order and Schedule

4. The parties request that this Court enter their agreed order, a copy of which is attached hereto as Exhibit A.

DATED: April 28, 2008

URB, INC., XEZ, INC., and ANTHONY URBANOWSKI

STARTREHAB, GREGORY BINGHAM, & ROBERT BINGHAM, PIONEER SERVICES, LLC and 7303 INCORPORATED d/b/a/STARTREHAB, INC.

By: /s/ Marla R. Shade Attorney for Plaintiff/Third-Party Defendants By: /s/ Catherine Simmons-Gill Attorney for Defendants/Third-Party Plaintiffs

William E. Meyer, Jr. Marla R. Shade SCHIFF HARDIN LLP 6600 Sears Tower Chicago, Illinois 60606 (312) 258-5500 (telephone) (312) 258-5600 (fax) wmeyer@schiffhardin.com mshade@schiffhardin.com

Catherine Simmons-Gill, Esq. 221 North LaSalle Street **Suite 2036** Chicago Illinois 60601 312-609-6611 (telephone) 312-609-6610 (fax) simmonsgill@gmail.com